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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANH THE DUONG,

Defendant.

No. CR 01-20154

STIPULATION AND ~~PROPOSED~~
ORDER AUTHORIZING DEPOSITION
PURSUANT TO FED. R. CRIM. P. 15

It is hereby stipulated by and among counsel for the UNITED STATES, Assistant U.S. Attorneys James T. Chou and Shawna Yen; and counsel for the Defendant Anh The Duong, David Andersen, Esq., that pursuant to Rule 15 of the Federal Rules of Criminal Procedure, the Court should authorize the taking of the deposition of Dr. Scott Atlas, subject to the agreements set forth below.

The parties agree that the deposition of Dr. Scott Atlas will be taken on December 3, 2010 at 11:00 a.m. at the United States Courthouse located at 280 South First Street, San Jose,

Stipulation and Proposed Order
for Rule 15 Deposition

FILED

NOV 23 2010

HUGHARD W. WIERING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

CA 95113.

The parties also agree that the deposition will be recorded by a court-certified court reporter, and that the deposition will be videotaped.

In addition, the parties agree that all objections are preserved for future litigation, with the exception that objections as to the form of the question must be timely made at the time of deposition, or they are waived.

Respectfully submitted,

Dated: November 19, 2010

MELINDA HAAG
UNITED STATES ATTORNEY

/S/

JAMES T. CHOU
SHAWNA YEN
Assistant U.S. Attorneys

Dated: November 19, 2010

/S/

DAVID ANDERSEN, ESQ.
Attorney for Anh The Duong

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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	CR 01-20154 JF
)	
Plaintiff,)	[PROPOSED] ORDER AUTHORIZING
)	DEPOSITION PURSUANT TO
v.)	<u>FED. R. CRIM. P. 15</u>
)	
ANH THE DUONG,)	
)	
Defendant.)	

Based on the stipulation of the parties and for good cause shown,
IT IS HEREBY ORDERED that deposition of Dr. Scott Atlas will be authorized and
taken pursuant to Rule 15 of the Federal Rules of Criminal Procedure.

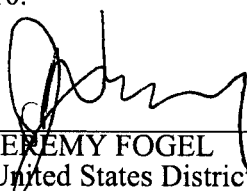
IT IS FURTHER ORDERED that the deposition of Dr. Scott Atlas will be taken on
December 3, 2010 at 11:00 a.m. at the United States Courthouse located at 280 South First
Street, San Jose, CA 95113.

IT IS FURTHER ORDERED that the deposition will be recorded by a court certified
court reporter and videotaped. The parties are authorized to bring the necessary videotaping

equipment to the designated room of the federal courthouse for this purpose.

IT IS FURTHER ORDERED that all objections are preserved for future litigation, with the exception that objections as to the form of the question must be timely made at the time of deposition, or they are waived.

Dated this 22nd day of November, 2010.


JEREMY FOGEL
United States District Judge